

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In re Vitamin C Antitrust Litigation

Master File 06-MD-1738 (DGT) (JO)

This Document Relates To:

ALL CASES

**NOTICE OF DIRECT AND INDIRECT PURCHASER PLAINTIFFS' JOINT MOTION
FOR APPROVAL OF NOTICE PLAN AND FORM OF NOTICE**

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Support of Direct and Indirect Purchaser Plaintiffs' Joint Motion for Approval of Notice Plan and Form of Notice, Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable Brian M. Cogan, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order:

1. directing Class Counsel to disseminate notices to the Certified Classes and the Indirect Purchaser Damages Class;
2. setting a deadline for class members to exclude themselves from the Indirect Purchaser Damages Class;
3. setting a deadline for members of the Direct Purchaser Damages Class who have not already done so to submit a Claim Form to the Claims Administrator;
4. setting a deadline for class members to serve and file any objections to either of the settlements, the request for attorneys' fees and litigation expenses, the Plan of Allocation for the distribution of the Direct Purchaser Damages Class settlement fund, and the proposal for the distribution of the Indirect Purchaser Damages Class settlement fund(s);
5. scheduling a Fairness Hearing to (a) determine the fairness, reasonableness, and adequacy of the settlements, and whether each should be finally approved by the Court; (b) evaluate plaintiffs' request for attorneys' fees and litigation expenses; and (c) evaluate the Plan of Allocation for distribution of the Direct Purchaser Damages Class settlement, and the proposal for the distribution of the Indirect Purchaser Damages Class settlement fund(s);
6. granting such other and further relief as may be appropriate.

Dated: April 29, 2012

Respectfully submitted,

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